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1 WHEREAS the Plaintiffs and Defendants (the “Parties”) in this action are engaged in
2 ongoing discussions regarding a potential methodology for sampling documents from the records
3 responsive to Plaintiffs’ Freedom of Information Act request, in order to conserve the resources
4 of the Parties and the Court in resolving this litigation;

5 WHEREAS the Parties believe that their efforts to reach an agreement on the sampling
6 methodology to be employed in this matter would benefit from participation in a conference
7 before U.S. Magistrate Judge Laurel Beeler;

8 WHEREAS the Parties have reserved Tuesday, May 14, 2013, at 9:30 a.m. in the
9 courtroom of the Honorable Laurel Beeler for the purposes of participating in such a conference;

10 IT IS HEREBY AGREED AND STIPULATED THAT:

- 11 I. The Parties will participate in a settlement conference before the Honorable Laurel
12 Beeler, U.S. Magistrate Judge, on Tuesday, May 14, 2013, at 9:30 a.m. for the purpose
13 of attempting to reach an agreement on a sampling methodology to be employed in
14 this matter; and
- 15 II. As instructed by the Court’s clerk, the Parties shall submit their updated settlement
16 conference statement to LBPO@cand.uscourts.gov, by May 7, 2013.

1 Dated: March 21, 2013
2
3

4 By: /s/ Andrew Zee
M. Andrew Zee

5 STUART F. DELERY
Principal Deputy Assistant Attorney General
6 JOHN R. TYLER
Assistant Branch Director
7 M. ANDREW ZEE (CA Bar 272510)
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22 Attorneys for Plaintiffs
23 THE AMERICAN CIVIL LIBERTIES UNION
24 OF NORTHERN CALIFORNIA, ASIAN LAW
25 CAUCUS, AND THE SAN FRANCISCO BAY
26 GUARDIAN

[PROPOSED] ORDER

Having reviewed the parties' joint stipulation, and for good cause shown, the Parties shall appear for a settlement conference before Magistrate Judge Laurel Beeler on Tuesday, May 14, 2013, at 9:30 a.m. for the purpose of attempting to reach an agreement on a sampling methodology to be employed in this matter.

It is so ORDERED this ____ day of March, 2013.

The Honorable Laurel Beeler
United States Magistrate Judge

ATTESTATION OF E-FILED SIGNATURE

I, Angela E. Kleine, am the ECF User whose ID and Password are being used to file this Joint Stipulation and [Proposed Order]. In compliance with General Order 45, X.B., I hereby attest that Julia Harumi Mass, Nasrina Bargzie, S. Raj Chatterjee, and M. Andrew Zee have concurred in this filing.

Dated: March 21, 2013

By: /s/ *Angela E. Kleine*

Angela E. Kleine

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